

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE ROYALTY NETWORK, INC.,

Plaintiff,

-against-

COLUMBIA RECORDING CORPORATION,
SONY BMG MUSIC ENTERTAINMENT,
Individually and d/b/a SONY BMG SALES
ENTERPRISE, BEYONCE GISSELLE
KNOWLES, individually and d/b/a B-DAY
PUBLISHING, and EMI APRIL MUSIC, INC.,

Defendants.

Case No. 07-CV-3067

**CERTIFICATE PURSUANT TO
RULE 7.1 AND LOCAL RULE
7.1.1**

Pursuant to FEDERAL RULE OF CIVIL PROCEDURE 7.1 and Rule 7.1.1 of the Local Civil Rules of the Southern District of New York, and to enable judges and magistrates of the Court to evaluate possible disqualification or recusal, the undersigned counsel of record for Defendants Beyoncé Knowles, Sony BMG Music Entertainment, incorrectly sued as Columbia Recording Corporation, and EMI April Music, Inc., certify that Sony BMG Music Entertainment is a joint venture between Sony Corporation and Bertelsmann, A.G. Shares of Sony Corporation trade on the Tokyo Stock Exchange and as American Depositary Receipts on the New York Stock Exchange under the symbol SNE. Bertelsmann, A.G. is privately held. EMI April Music, Inc., is a subsidiary of EMI Group, plc. Shares of EMI Group, plc are traded on the Over-the-Counter market in the United States under the symbol EMIPY.

Dated: New York, New York
May 4, 2007

Respectfully submitted,

STUMPF CRADDOCK MASSEY FARRIMOND

By :

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Knowles; Sony BMG Music Entertainment,
incorrectly sued as Columbia Recording
Corporation and Sony BMG Sales Enterprise; and
EMI April Music, Inc.*

DAVIS & GILBERT LLP

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